

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

<b>UNITED STATE OF AMERICA</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 4:18 CR 899 RLW</b>
	)	
<b>THOMAS B. WILSON,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION TO CONTINUE THE SENTENCING HEARING**

COMES NOW Defendant Thomas Wilson, by and through counsel, and respectfully requests this Court to continue the sentencing hearing for approximately two weeks. In support of this Motion, Mr. Wilson states:

1. The Defendant's sentencing hearing is scheduled for July 16, 2020.
2. Counsel for the Defendant has been on sick leave since April 24.
3. Earlier today the Government filed a sentencing memorandum opposing the Defendant's request for a sentencing reduction based on the amount of time he has spent in custody while the Government delayed bringing this prosecution.
4. Counsel for the Defendant respectfully requests additional time to prepare a response to the Government's sentencing memorandum.
5. Assistant United States Attorney Angie Danis does not object to this request.

WHEREFORE, Defendant Thomas Wilson respectfully requests this Court to grant his motion to continue the sentencing hearing for at approximately two weeks, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

*s/ Stephen R. Welby*  
STEPHEN R. WELBY  
Federal Public Defender  
650 Missouri Avenue, Room G10A  
East St. Louis, Illinois 62201  
(618) 482-9050

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he has caused a true and correct copy of the foregoing to be served upon all counsel of record via electronic filing with the Clerk of the Court using CM/ECF system this 13<sup>th</sup> day of July, 2020.

*s/ Stephen R. Welby*  
STEPHEN R. WELBY